

# **EXHIBIT 4**

# **FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
)  
WAYMO LLC, )  
)  
Plaintiff, )  
)  
vs. ) Case No.  
) 3:17-cv-00939-WHA  
UBER TECHNOLOGIES, INC., )  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
)  
Defendants. )  
\_\_\_\_\_

OUTSIDE ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF TIM WILLIS  
San Francisco, California  
Thursday, March 23, 2017  
Volume I

Reported by: SUZANNE F. GUDELJ  
CSR No. 5111  
Job No. 2576518  
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1 but that's if -- assuming that you're networked,  
2 right?

3 MS. BAILEY: Object to form.

4 THE WITNESS: During that period, I'm not  
5 aware of him not having access to the network. 11:24:10

6 BY MR. MUINO:

7 Q And what if he's reading documents away  
8 from the office?

9 A He could WiFi at home.

10 Q Have you exported documents to your 11:24:22  
11 devices?

12 A Yes, I have.

13 Q How frequently do you export documents to  
14 your devices for your work?

15 A Not frequently. Rarely. 11:24:38

16 Q But you've done it before?

17 A Yes.

18 Q And why did you do it on those occasions?

19 A If I needed to communicate with a supplier,  
20 maybe a contract where I'm revising it; or they're 11:24:47

21 sending me a presentation, but I don't have to  
22 download -- I mean, it's downloaded from email, but

23 only if I -- typically only if I'm exchanging with

24 the supplier information. Red line documents, those

25 type of things that somebody needs to use, Excel or 11:25:06

1 (Discussion off the record.)

2 THE WITNESS: [REDACTED] laser components;

3 [REDACTED] which is actually [REDACTED] so you'll see

4 [REDACTED] there. And those are the key ones. There may

5 be some other ones on here, but I don't know the -- 12:29:24

6 by looking at them directly.

7 BY MR. MUINO:

8 Q What does Google acquire from [REDACTED]

9 MS. BAILEY: Objection.

10 THE WITNESS: [REDACTED] they provide the laser 12:29:34

11 for the KBR.

12 BY MR. MUINO:

13 Q When you say laser, you mean the diodes?

14 A The [REDACTED]

15 (Reporter clarification.)

16 The [REDACTED] yeah. I don't know the

17 exact -- there's an acronym for it. There's a

18 [REDACTED] that it is.

19 Q And [REDACTED] what do they supply?

20 A They provide lasers for the [REDACTED] And -- 12:29:55

21 yes.

22 Q Now both [REDACTED] and [REDACTED] are publicly known

23 companies, right?

24 A [REDACTED] and [REDACTED] yes, yes.

25 Q They presumably have their own websites? 12:30:13

1 A Yes.

2 Q They're not exclusive to Google Waymo?

3 A No.

4 Q Is that also true for the optics suppliers

5 that we talked about: [REDACTED] 12:30:27

6 [REDACTED] they also are

7 publicly known companies?

8 A They are in the public domain, yes.

9 Q Not -- they're not exclusive suppliers to

10 Google? 12:30:45

11 A Not that I'm aware of, no. Not to Waymo,

12 no.

13 Q Looking at this list, do you know if Uber  
14 uses some or all of these vendors?

15 A I wouldn't know. 12:31:12

16 Q Have you ever spoken with any vendor about  
17 its doing business with Uber?

18 A Yes.

19 Q And on what occasion --

20 A A vendor approached me -- 12:31:24

21 Q -- was that?

22 A -- [REDACTED] to let me know that they were  
23 planning on -- or that Uber had reached out to them  
24 to do business with them.

25 Q When did that occur? 12:31:37

1 BY MR. MUINO:

2 Q In your experience, do Google employees,  
3 former Google employees, after they leave the  
4 company, ever get consulted in connection with their  
5 work? Is there any follow-up to ask them questions 12:59:55  
6 pertinent to their former work?

7 MS. BAILEY: Object to form.

8 THE WITNESS: Not that I'm aware of.

9 BY MR. MUINO:

10 Q Do you know if after Mr. Kshirsagar left, 01:00:07  
11 anyone contacted him to ask him questions about his  
12 prior work?

13 A I never reached out to him, no.

14 Q How about Mr. Raduta?

15 A I never reached out to him. 01:00:18

16 Q Now, you don't have any information that  
17 Uber is using any of Waymo or Google's trade  
18 secrets, do you?

19 MS. BAILEY: Object to form.

20 THE WITNESS: No. 01:00:41

21 BY MR. MUINO:

22 Q And you may be aware there's an allegation  
23 that 14,000, approximately, documents were  
24 misappropriated. That's an allegation in this case.  
25 You don't have any information that Uber is using 01:00:58